

UNITED STATES DISTRICT COURT

for the

District of Colorado

United States of America

v.

Jon Hallford,

Defendant

Case No. 23-mj-00187-JPO

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Jon Hallford,
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1073(1), Unlawful Flight to Avoid Prosecution

Date: November 7, 2023, at 1:30 p.m.

s/ James P. O'Hara
Issuing officer's signature

City and state: Denver, CO

James P. O'Hara, Us. Magistrate Judge

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT

for the

District of Colorado

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v.

JON HALLFORD

Defendant(s)

Case No. 23-mj-00187-JPO

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief: On or about October 5, 2023, in the State and District of Colorado and elsewhere, Jon Hallford defendant herein, did move and travel in interstate and foreign commerce with intent to avoid prosecution, custody, and confinement after conviction under the laws of the State of Colorado for crimes which are felonies under the laws of the State of Colorado, all in violation of Title 18, United States Code, Section 1073(1).

I further state that I am a Special Agent, with the Federal Bureau of Investigation (FBI) and that this complaint is based on the Affidavit, which is attached hereto and herein incorporated by reference.

Code Section
18 U.S.C. § 1073(1)

Offense Description
Unlawful Flight to Avoid Prosecution

This criminal complaint is based on these facts:

See Affidavit attached hereto and herein incorporated by reference.

☒ Continued on attached sheet.

s/Andrew Cohen

Complainant's signature

Andrew Cohen, Special Agent, FBI

Printed name and title

Sworn to before me and: ☐ signed in my presence.

☐ ☒ X submitted, attested to, and acknowledged by reliable electronic means.

Date: November 7, 2023

City and state: Denver, CO

s/James P. O'Hara

Judge's signature

James P. O'Hara

James P. O'Hara

DEFENDANT: Jon Hallford

YOB: 1979

OFFENSE(S): 18 U.S.C. § 1073(1), Unlawful Flight to Avoid Prosecution

LOCATION OF
OFFENSE: El Paso County, Colorado

PENALTY: NMT 5 years imprisonment, NMT \$250,000.00 fine or both; and
\$100.00 Special Assessment

AGENT: Andrew Cohen
Special Agent, Federal Bureau of Investigation

AUTHORIZED
BY: Tim Neff
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less

THE GOVERNMENT

X will seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDEF CASE: __ Yes X No

AFFIDAVIT

I, Andrew Cohen, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I am a Special Agent with the FBI, and have been since 2014. I am currently assigned to the Denver Division of the FBI, and specifically to the Southern Colorado Safe Streets Task Force in Colorado Springs. During the course of my career, I have participated in investigations involving possession of firearms by prohibited persons, distribution of illegal drugs, the internet, cellular telephones and email, and I am familiar with social media networks. I have been the affiant for several Title III wiretaps. I also have investigated cases involving the distribution of drugs and conspiracies designed to earn money. As part of my duties, I have also investigated fugitives wanted for violations of 18 U.S.C. § 1073(1), Unlawful Flight to Avoid Prosecution/Confinement.
2. The facts in support of this affidavit and contained in the following paragraphs are the result of the attempt to locate and apprehend Jon Hallford, a fugitive wanted for arrest. The statements contained herein are based in part on information provided by other state and local law enforcement officers, as well as my personal knowledge.
3. A similar application is also being submitted for the arrest of Carie Hallford (the wife of Jon Hallford) for the same violation.
4. This affidavit is being submitted in support of a criminal complaint charging Jon Hallford with a violation of 18 U.S.C. § 1073(1), Unlawful Flight to Avoid Prosecution/Confinement. Because this affidavit merely seeks to outline probable cause in support of the criminal complaint. I have not included each and every fact known concerning this investigation. However, I do not believe I have omitted any material fact that undermines the statements and conclusions set forth below.

INVESTIGATION

5. On or about October 3, 2023, law enforcement was alerted to a horrific odor of decomposing bodies coming from 31 Werner Rd, Penrose, Colorado. An investigation was initiated by the Fremont County Sheriff's Office, and investigators learned that 31 Werner Rd, Penrose, CO was the business location for Return to Nature Funeral Home. Jon and Carie Hallford are the owners of the Return to Nature Funeral Home and are married.
6. On or about October 4, 2023, a Colorado Department of Regulatory Agencies (DORA) investigator spoke with Jon Hallford to gain access to the building. Hallford agreed to meet an inspector at 31 Werner Rd to allow the inspectors access to the

inside of the building for inspection. The owner told DORA he was using the building in Penrose to learn how to do taxidermy and that he knew he had a problem there. An appointment between DORA and the owner was set for 2:00 p.m on October 4, 2022. However, Hallford failed to show up for the appointment, and this was the last communication law enforcement had with Jon Hallford.

7. A search warrant was obtained and executed for 31 Werner Rd, Penrose, Colorado. During the search, investigators recovered approximately 189 dead bodies from within the building. The conditions within the building were abhorrent; bodies were located stacked on top of each other and some were not in body bags. Human decomposition fluids and insects lined the floors. Some of the bodies had dates of death in 2019, and the positive identification of all of the bodies has been difficult.
8. The death certificate information was obtained and reviewed for all of the identified bodies. The identified bodies were reported to the State of Colorado by Return to Nature as have been cremated or buried.
9. The discovery of the 189 dead bodies made local and national news and has continued to be in the news cycle over the last several weeks. Return to Nature Funeral Home had given the families of loved ones their supposed cremains; law enforcement now knows the cremains each family was given could not have been their loved one uncovering years of fraud, theft, and the abuse of the corpses within 31 Werner Rd, Penrose, CO.
10. When DORA made the telephone call to Jon Hallford on October 4, 2023, Jon Hallford knew what law enforcement would find inside the building. Based on the timing of that phone, and the activity of Jon Hallford's phone as discussed below, it is reasonable to believe Jon and Carie Hallford fled Colorado to avoid prosecution.
11. Law enforcement identified the cellular telephone numbers utilized by the Hallfords of 415-377-7658 and 719-964-4298. The carrier of these phones is T-Mobile, and the subscriber for each is listed as Carie Hallford. Investigators believe the x7658 phone is utilized by Jon, and the x4298 phone is utilized by Carie. Investigators obtained search warrants for records, precise geolocation information, and a pen register/trap and trace (PRTT) device with cell site simulator.
12. A review of those records revealed that on or about October 4, 2023, Jon Hallford discontinued the active use of his x7658 cellular telephone. I submit it is likely Jon Hallford likely turned off the cellular device to avoid detection from law enforcement, to conceal his movements, and to prevent law enforcement from being able to contact him. I have conducted dozens of investigations where defendants "drop" their phone or obtain a different phone that law enforcement is not aware of.

13. According to the data from the PRTT, the x7658 phone has continued to receive incoming calls and texts, but the phone appears to be off.
14. By the middle of October 2023, the x4298 phone had already traveled out of state and was in Oklahoma. The x4298 phone has remained in Oklahoma.
15. On or about October 5, 2023, investigators executed a search warrant at 944 Elkton Dr, Colorado Springs, Colorado, another place of business for Return to Nature Funeral Home. This location was the customer facing location and during the search investigators recovered business and accounting records for Return to Nature. To my knowledge, the Hallfords have not been back to this business location.
16. On or about October 31, 2023, the landlord for 944 Elkton Dr, Colorado Springs, CO was in communication with the Hallfords via text message and email. The landlord sent an eviction notice to the Hallford's email account, and they replied to indicate they would not contest the eviction. The Hallfords told the landlord they would not be able to remove their property and for the landlord to do what he wanted with it. I submit this behavior is consistent with the Hallford's flight out of Colorado.
17. On or about October 17, 2023, investigators executed a search warrant at the Hallford's residence at 7679 Crestone Peak Trail, Colorado Springs, Colorado. The Hallfords were not located at the residence, and items such as their toothbrushes were missing. The landlord for the Hallford's residence was also contacted, and she told law enforcement the Hallfords did not make their October rent payment.
18. On or about October 30, 2023, a civil class action lawsuit was filed against Jon and Carie Hallford and Return to Nature Funeral Home. The filing of this lawsuit also made the news cycle.
19. On or about November 7, 2023, felony arrest warrants were issued for Jon and Carie HALLFORD. I have reviewed the arrest affidavits and warrants, issued in the District Court, El Paso County, State of Colorado. Jon and Carie HALLFORD had the same charges on their warrants, which included approximately 190 counts of Abuse or a Corpse in violation of CRS § 18-13-101(1)(b), a Class 6 Felony, 5 counts of Theft in violation of CRS § 18-4-401(1)(b), 1 count a Class 5 Felony, 4 Counts a Class 6 Felony, 4 counts of Money Laundering in violation of CRS § 18-5-309(1)(a)(II)(A), and over 50 counts of Forgery in violation of CRS 18-5-102(1)(e) , a Class 5 felony.
20. Geolocation of the telephone believed to be utilized by Carie Hallford placed the cellular device routinely north of Wagoner, OK from mid October 2023 to November 7, 2023. The cellular tower that the x4298 phone is connected to would service the address of 29423 E 690 Rd, Wagoner, OK, the residence of Jon Hallford's parents.

21. In early November of 2023, FBI Agents based in the Oklahoma City, OK FBI Division conducted physical surveillance at the 29423 E 690 Rd, Wagoner, OK. During that surveillance, they observed a black Volkswagen Tiguan bearing Colorado license plate AYJC69, registered to Jon Hallford, parked outside of the residence. On November 6, 2023, the Agents returned to the same address and observed the black Volkswagen Tiguan was still parked outside of the residence.
22. I believe it is unlikely that Jon and Carie Hallford separated, and that it would be reasonable that both Jon and Carie Hallford will eventually be located together.
23. In conclusion, an active investigation and prosecution exists, and State of Colorado felony arrest warrants exist for Jon and Carie Hallford. The Hallfords were made aware of the investigation on October 4, 2023 when DORA called Jon Hallford. Furthermore, the news cycle would have also made the Hallfords aware of the investigation. Cellular telephone records indicate Jon Hallford discontinued use of his phone, and that Carie Hallford's cell phone is near Wagoner, Oklahoma. A vehicle registered to Jon Hallford was observed in early November of 2023 parked outside of his parent's house in Wagoner, Oklahoma.
24. Based on the facts outlined above, I submit there is probable cause to believe that on or about October 5, 2023, in the State and District of Colorado and elsewhere, Jon Hallford did move and travel in interstate commerce with intent to avoid prosecution, custody, and confinement after conviction under the laws of the State of Colorado for crimes which are felonies under the laws of the State of Colorado, all in violation of 18 U.S.C. § 1073(1). Therefore, I respectfully request the issuance of an arrest warrant.

s/Andrew Cohen
Andrew Cohen
Special Agent
FBI

Submitted, attested to, and acknowledged by reliable electronic means on this 7th day of November.

s/ James P. O'Hara
JAMES P. O'HARA
U.S. MAGISTRATE JUDGE

Affidavit reviewed and submitted by Tim Neff, Assistant United States Attorney.